

Case 3:24-cr-03005-LTS-KEM Document 3 Filed 01/18/24 Page 1 of 4

### **Count 1**

#### **Conspiracy to Distribute a Controlled Substance**

Between on or about June 2023 and continuing to on or about December 2023, in the Northern District of Iowa and elsewhere, defendant AMANDA KAY JOHNSON, a/k/a AMANDA KAY ADAMS, did knowingly and intentionally combine, conspire, confederate, and agree with persons known and unknown to the Grand Jury, to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine and 50 grams or more of actual (pure) methamphetamine, a Schedule II controlled substance.

Before defendant AMANDA KAY JOHNSON, a/k/a AMANDA KAY ADAMS committed the offense charged in this Count, she was convicted of the following:

- (1) On or about July 1, 2020, defendant was convicted in the United States District Court for the Northern District of Iowa, Case No. 19-CR-04079, of conspiracy to distribute methamphetamine and possession with intent to distribute and aid and abet another in the possession with intent to distribute methamphetamine, a felony drug offense, and a serious drug felony, for which she served more than 12 months of imprisonment and for which she was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

This was in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 846, and 851.

### **Count 2**

#### **Distribution of a Controlled Substance**

On or about November 15, 2023, in the Northern District of Iowa, defendant AMANDA KAY JOHNSON, a/k/a AMANDA KAY ADAMS did knowingly and intentionally distribute and did aid, abet, counsel, command induce and procure the

distribution of 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

Before defendant AMANDA KAY JOHNSON, a/k/a AMANDA KAY ADAMS committed the offense charged in this Count, she was convicted of the following:

- (1) On or about July 1, 2020, defendant was convicted in the United States District Court for the Northern District of Iowa, Case No. 19-CR-04079, of conspiracy to distribute methamphetamine and possession with intent to distribute and aid and abet another in the possession with intent to distribute methamphetamine, a felony drug offense, and a serious drug felony, for which she served more than 12 months of imprisonment and for which she was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

This was in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 851.

### **Count 3**

#### **Distribution of a Controlled Substance**

On or about December 4, 2023, in the Northern District of Iowa, defendant AMANDA KAY JOHNSON, a/k/a AMANDA KAY ADAMS did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

Before defendant AMANDA KAY JOHNSON, a/k/a AMANDA KAY ADAMS committed the offense charged in this Count, she was convicted of the following:

- (1) On or about July 1, 2020, defendant was convicted in the United States District Court for the Northern District of Iowa, Case No. 19-CR-04079, of conspiracy to distribute methamphetamine and possession with intent to distribute and aid and abet another in the possession with intent to distribute methamphetamine, a felony drug offense, and a serious drug felony, for which she served more than 12 months of imprisonment and for which she was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

This was in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 851.

**Count 4**

**Possession with Intent to Distribute a Controlled Substance**

On or about December 20, 2023, in the Northern District of Iowa, defendant AMANDA KAY JOHNSON, a/k/a AMANDA KAY ADAMS did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

Before defendant AMANDA KAY JOHNSON, a/k/a AMANDA KAY ADAMS committed the offense charged in this Count, she was convicted of the following:

- (1) On or about July 1, 2020, defendant was convicted in the United States District Court for the Northern District of Iowa, Case No. 19-CR-04079, of conspiracy to distribute methamphetamine and possession with intent to distribute and aid and abet another in the possession with intent to distribute methamphetamine, a felony drug offense, and a serious drug felony, for which she served more than 12 months of imprisonment and for which she was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

This was in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 851.

TIMOTHY T. DUAX  
United States Attorney

By:

  
SHAWN S. WEHDE  
Assistant United States Attorney

A TRUE BILL

Grand Jury Foreperson

1/18/24  
Date

PRESENTED IN OPEN COURT  
BY THE  
FOREMAN OF THE GRAND JURY

And filed 1/18/2024  
PAUL DE YOUNG, CLERK